

B. Status of Settlement Discussions

2. The Parties have discussed settlement. Settlement is unlikely at this time, but the parties will attempt in good faith to resolve this matter and will notify the Court if they do so.

C. Proposed Extended Discovery Plan

3. The Parties began discovery prior to the transfer of venue to this Court. However, the discovery process is not complete.
4. Defendants/Counterclaim-Plaintiffs would like to continue the discovery process and use the extended time to serve and depose numerous party and non-party witnesses who are scattered around the country and world.
5. Plaintiffs/Counterclaim-Defendants oppose any discovery taking place after September 15, 2025. Plaintiffs/Counterclaim-Defendants propose the continuation of the scheduling order that was in place prior to transfer from the United States District Court for the Southern District of Florida, Fort Pierce Division, which is attached hereto.
6. The Parties have discussed their intended conduct of discovery, generally, including written discovery, fact witness depositions, and expert witness depositions.

D. Prior Motions

7. The Parties filed various motions in this case while the case was pending in the United States District Court for the Southern District of Florida, Fort Pierce Division. All pending motions were denied as moot when the case was transferred to this Court on March 26, 2025. However, the Parties agree that some of these

motions may be refiled following renewed efforts between the parties to meet and confer on any requested relief.

E. Protective Order

8. The Parties agree that a protective order is appropriate for this case. The Parties further agree to the provisions of the proposed protective order attached to this report, except that they disagree about whether the Parties and their lawyers must destroy confidential and attorneys' eyes only ("AEO") documents at the conclusion of the litigation. The attached proposed protective order includes Defendants' request that confidential and AEO documents be returned to the producing party at the conclusion of litigation.
9. The Parties disagree about whether the protective order should apply to discovery that took place prior to transfer, except where previously noted during such discovery.

F. Pre-Trial Conference, Trial Date and Estimated Length

10. The Parties estimate that one week should be sufficient for this **non-jury** trial.
11. Defendants/Counterclaim Plaintiffs ask the Court for a trial setting on or near Monday April 26, 2027, with a pre-trial conference date of April 19, 2027.
12. Plaintiffs/Counterclaim Defendants ask the Court for a trial setting in fall 2025.

Dated: May 5, 2025,

Respectively submitted,

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By: /s/ Robert L. Sayles

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CERTIFICATE OF SERVICE

I certify that all current counsel of record have been served with a copy of the foregoing document via the Court's CM/ECF system according to Local Civil Rule 5.1 on this 5th day of May, 2025.

/s/ Brian M. Gillett

Brian M. Gillett